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Following LAYMAN discovery disclosures pursuant to Rule 16.

PLAINTIFF REQUEST DISCOVERY
PURSUANT TO Rule 16

Please disclose the following:

- (I) THE EXACT TIME AND DATE THE RAID WAS TO BE EXECUTED PURSUANT TO WARRANT.
- (II) POLICY OF PHILADELPHIA POLICE DEPARTMENT AND OR MANUAL FOR PPD NO KNOCK OR ANNOUNCE RAIDS
- (III) POLICY OF PPD AND OR MANUAL FOR EARLY MORNING RAIDS OF PRIVATE ROWHOU DWELLINGS.
- (VI) PROVIDE THE PERSONAL FILES, CONDUCT OR COMPLAINTS OF EACH DEFENDANT
- (V) PLAINTIFF RESERVES THE RIGHT TO MAKE ADDED DISCLOSURES AFTER CONSULTATION WITH PROFESSIONAL COUNSEL.

Respectfully
Khalef Seana

JAMES WILLIAMS

31734-037

FDC-Philadelphia

700 Arch St.

Philadelphia, PA 19105

PHILADELPHIA PA 190

27 DEC 2022 PM 10 L



U.S.M.S.
X-RAY

CLERK OF COURT

UNITED STATES DISTRICT COURT
601 MARKET STREET

Philadelphia, PA 19106



19106-179699

